

In the case of:

WILLIAM ALLEN MEANS v.

E.M. PETERSON, et al.

WILLIAM MEANS

April 20, 2021



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6		E X H I B I T S	Identified
7		MEANS DEPOSITION EXHIBIT NO. 1	86
8		(Photocopied color photograph)	
9		MEANS DEPOSITION EXHIBIT NO. 2	89
10		(Photocopied color photograph)	
11			
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13			
14	The continuation of the deposition of WILLIAM MEANS was taken under the Federal Rules of Civil Procedure in the above-entitled action, before Laurie L. Cunningham, Registered Professional Reporter and Notary Public within and for the State of West Virginia, at 1:06 - 3:06 p.m., on Tuesday, the 20th day of April, 2021, at the law offices of Calwell Luce diTrapano PLLC, 500 Randolph Street, Charleston, West Virginia.		
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22	REALTIME REPORTERS, LLC LAURIE L. CUNNINGHAM, RPR 713 Lee Street Charleston, WV 25301 1-304-344-8463		
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1	WILLIAM MEANS,		
2	called as a witness in the above-mentioned action, was		
3	sworn according to law, was examined and testified as		
4	follows; to-wit:		
5	EXAMINATION		
6	BY MR. RUGGIER:		
7	Q. Billy, you know my name is Duane Ruggier. I		
8	represent the South Charleston Police Department, and		
9	this is going to be the continuation of your previous		
10	deposition. I don't think I should go too long today,		
11	but we will see.		
12	We kind of left the deposition at the very		
13	end, but where you had basically passed out or I don't		
14	know how you want to call it, but things went white on		
15	you.		
16	Do you recall that testimony?		
17	A. Yeah.		
18	Q. So if we could go back to the scene where that		
19	scene of the pursuit and the ending of the pursuit and		
20	where it all kind of went down there on the railroad		
21	tracks?		
22	A. (Nodding head.)		
23	Q. Is that yes?		
24	A. Yeah.		

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<p>1 Q. All right. There you go.</p> <p>2 So take me back there. And just kind of to</p> <p>3 refresh, you are -- you were driving on your motorcycle</p> <p>4 and you are being pursued by police officers; is that</p> <p>5 correct?</p> <p>6 A. Basically.</p> <p>7 Q. All right. At the time when you were driving</p> <p>8 on your motorcycle, say, in the, you know, I don't know,</p> <p>9 the ten seconds before the arrest, do you realize that</p> <p>10 you're being pursued by police officers?</p> <p>11 A. I realized they were behind me, yeah.</p> <p>12 Q. Do you realize that they are trying to arrest</p> <p>13 you?</p> <p>14 A. No.</p> <p>15 Q. Do you realize that they're trying to pull you</p> <p>16 over?</p> <p>17 A. No.</p> <p>18 Q. Do you hear any sirens?</p> <p>19 A. No.</p> <p>20 Q. Do you see any lights?</p> <p>21 A. No.</p> <p>22 Q. You had on, you said, Bluetooth through your</p> <p>23 ears?</p> <p>24 A. Yeah. I just put Bluetooth air buds, yeah.</p>	<p>Page 5</p> <p>1 Q. Remember you've got to say "yes" or "no" so</p> <p>2 the court reporter can get it down.</p> <p>3 A. No, I don't remember what kind it was.</p> <p>4 Q. All right. You were wearing a helmet?</p> <p>5 A. Yeah.</p> <p>6 Q. What is your helmet?</p> <p>7 A. Huh?</p> <p>8 Q. What kind of helmet were you wearing?</p> <p>9 A. A DOT approved helmet.</p> <p>10 Q. A what?</p> <p>11 A. A DOT approved helmet.</p> <p>12 Q. Department of Transportation approved helmet?</p> <p>13 A. It had the DOT sign on the back of it.</p> <p>14 Q. Had the what?</p> <p>15 A. DOT sign on the back. You know, it's on the</p> <p>16 back of all of them almost.</p> <p>17 Q. I don't, so explain it to me.</p> <p>18 A. It's -- I just explained it.</p> <p>19 Q. It's called a DOD?</p> <p>20 A. DOT.</p> <p>21 Q. DOT helmet.</p> <p>22 MR. diTRAPANO: Department of</p> <p>23 Transportation.</p> <p>24 A. Yeah.</p>
<p>1 Q. Right.</p> <p>2 A. I wear them when I ride.</p> <p>3 Q. And you don't know what you were listening</p> <p>4 to?</p> <p>5 A. No.</p> <p>6 Q. How were you getting -- was it music you were</p> <p>7 listening to?</p> <p>8 A. Yeah.</p> <p>9 Q. How were you getting music to your</p> <p>10 Bluetooth?</p> <p>11 A. Through my cell phone.</p> <p>12 Q. Okay. And you had your cell phone on you?</p> <p>13 A. Yeah.</p> <p>14 Q. What kind of cell phone was it?</p> <p>15 A. A Motorola.</p> <p>16 Q. Motorola what? Do you remember?</p> <p>17 A. Huh-uh. It was one of those newest Motorolas.</p> <p>18 Q. Say it again?</p> <p>19 A. It was one of the newest Motorolas.</p> <p>20 Q. So you don't remember what kind of Motorola it</p> <p>21 is?</p> <p>22 A. Huh-uh.</p> <p>23 Q. You've got to verbalize it.</p> <p>24 A. No.</p>	<p>Page 6</p> <p>1 MR. RUGGIER: Department of Transportation?</p> <p>2 Okay.</p> <p>3 A. It shows that it's a standard issued whatever</p> <p>4 helmet, I mean.</p> <p>5 Q. Okay. What color was it?</p> <p>6 A. Black.</p> <p>7 Q. Describe how the helmet looked. I mean, how</p> <p>8 was it?</p> <p>9 A. Like a full-face helmet.</p> <p>10 Q. Full-face helmet?</p> <p>11 A. Yeah.</p> <p>12 Q. So that means it's got something that goes in</p> <p>13 front of your jaw?</p> <p>14 A. Yeah.</p> <p>15 Q. And the area in front of your eyes is open?</p> <p>16 A. No. It had no visor.</p> <p>17 Q. You did not have a visor?</p> <p>18 A. No.</p> <p>19 Q. How come?</p> <p>20 A. Because it was too scratched up and I took it</p> <p>21 off.</p> <p>22 Q. Where did you get the helmet?</p> <p>23 A. It was given to me by a friend.</p> <p>24 Q. Who?</p>

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<p>1 A. I don't even remember. I've had so many 2 helmets, it's... 3 Q. Had you ever wrecked this bike before? 4 A. No. 5 Q. Had you ever wrecked on a motorcycle -- a 6 street motorcycle before? 7 A. Yeah. 8 Q. When did you previously wreck on a street 9 motorcycle? 10 A. I don't remember the date. It was a couple 11 years before. 12 Q. What happened? 13 A. I slid on gravel. I didn't have -- it had 14 bald tires. I couldn't afford them. 15 Q. Where did you slide on the gravel? 16 A. On Louddale, where I used to live. 17 Q. Okay. Were you under the influence of 18 anything when this happened? 19 A. No. 20 Q. You were not on any drugs? 21 A. No. 22 Q. Not taking any pills? 23 A. No. 24 Q. So we're going back to the scene, and you were</p>	<p>Page 9 1 and tell me what the incident was -- 2 A. My grandpa for one. He was -- 3 Q. Your grandpa? 4 A. He was just recently pulled over a couple 5 weeks ago -- or about a week ago. 6 Q. Okay. 7 A. And the cop actually asked him if I could 8 walk, if I really couldn't walk or not, I mean. 9 Q. Who is the -- who's your grandfather? 10 A. Okey Allen Cecil. 11 Q. Okey. O-K-E-Y? 12 A. Yeah. 13 Q. And do you know Okey's phone number? 14 A. 304-410-3619. 15 Let me make sure that's it. I'm pretty 16 positive it's it. 17 Q. What's that? 18 A. I want to make sure that's it. 19 Q. Okay. 20 A. Yeah, 410-3619. 21 Q. And did he tell you the officer that was 22 bullying him? 23 A. No. 24 Q. And when did this happen?</p>
<p>Page 10 1 telling me that you don't realize that those police 2 officers are trying to arrest you. 3 A. No. 4 Q. Okay. You just think that they're following 5 you? 6 A. Bullying me. 7 Q. What's that? 8 A. Bullying me is the way I looked at it. 9 Q. You call it bullying you? 10 A. Yeah. 11 Q. Why do you think, if you have any idea, why 12 the officers were trying to bully you? 13 A. I'm not sure. It seems to happen a lot out of 14 South Charleston. 15 Q. What do you mean by that? 16 A. Like multiple people have stated the South 17 Charleston, they're bullies. 18 Q. Who has told you that? 19 A. I don't -- I mean, multiple, multiple 20 people. 21 Q. Name them. 22 A. I can't name all these people. I mean, just 23 I've seen random people that have said it. 24 Q. I mean, can you tell me anybody in particular</p>	<p>Page 11 1 A. About a week ago. 2 Q. A week ago. So at the time of the police 3 pursuit in this case, that had not yet happened. 4 A. It wasn't a pursuit. He just pulled him 5 over. 6 Q. Okay. Right. But I'm saying at the time of 7 the pursuit in this case, this had not had happened. 8 A. What had not had happened? 9 Q. That your grandfather was bullied by a South 10 Charleston Police Officer. 11 A. No. It was afterwards. 12 Q. Okay. What did the officer ask supposedly? 13 A. If I could really not walk. 14 Q. And what did your grandfather tell him, to 15 your understanding? 16 A. He asked if he was joking. 17 Q. Can you walk? 18 A. No, I can't walk. 19 Q. What's that? 20 A. No, I can't walk. 21 Q. Okay. Can you stand? 22 A. No. 23 Can I touch my toes? No. Can I pull up my 24 socks? I can't put socks on.</p>

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	Page 13		Page 15
1 Q. You can't stand?		1 Q. Well, right, but I'm talking about directly	
2 A. No.		2 after. Are you --	
3 Q. And you can't touch your toes?		3 A. Directly after he struck me?	
4 A. No.		4 Q. Yes.	
5 Q. Why can't you touch your toes?		5 A. I've got the video, I mean, as soon as he	
6 A. Because I've got almost 11 inches of steel		6 struck me.	
7 rods in my back.		7 Q. Well, how about maybe -- are you talking about	
8 Q. So you can't bend forward?		8 the YouTube video that everybody's seen?	
9 A. No.		9 A. I guess so, yeah.	
10 Q. Well, I'll get into that a little more a while		10 Q. Okay. So what I'm talking about would be in	
11 later.		11 between the time when --	
12 So we're back to the scene of the accident.		12 A. There was no time in between when he struck me	
13 You are driving at -- how fast would you say that you're		13 and he stopped on the tracks, right in the middle of the	
14 driving?		14 tracks. He jumped out of his vehicle, came over. I was	
15 A. Below the speed limit. I was crossing the		15 going to stand up. He kicked me. I rolled back onto my	
16 railroad tracks.		16 back. I gave him -- stated my name, my birth date, and	
17 Q. Crossing the railroad tracks?		17 that's when they both commenced to pepper spraying and	
18 A. And I was struck.		18 macing me, whatever.	
19 Q. Crossing the railroad tracks below the speed		19 Q. Were you seated on the motorcycle when the	
20 limit?		20 South Charleston Police vehicle made contact with you?	
21 A. You slow down to cross the railroad tracks.		21 A. I would not be seated anywhere else.	
22 Q. Do you know what speed you were going?		22 Q. Just answer the question.	
23 A. No.		23 A. Yes, I was seated on the motorcycle.	
24 Q. Do you know what the speed limit was?		24 Q. Well, what I'm asking is, is were you -- so	
	Page 14		Page 16
1 A. No. I'm not sure. 25, 35, something like		1 you're on the motorcycle.	
2 that.		2 A. I was sitting on the seat of the motorcycle	
3 Q. So if you don't know the speed limit and you		3 when he struck my rear tire.	
4 don't know how fast you were going, how do you know you		4 MR. diTRAPANO: Just for the record, and I	
5 were driving below the speed limit?		5 guess to be instructional here, Billy, just like we did	
6 A. Because I know that I was slowing down so that		6 before, just wait for him to --	
7 I wouldn't wreck, I mean. Exactly what I expected the		7 THE DEPONENT: I'm sorry.	
8 whole time, as soon as I slowed down enough, that he		8 MR. diTRAPANO: -- ask the question. Don't	
9 would have struck my rear tire, as he did, and wrecked		9 anticipate what he's going to ask. It's going to	
10 me.		10 distort the record. Just let Duane ask the question,	
11 Q. So when you slowed down, he struck your rear		11 stop, listen to it, and give an answer, audible	
12 tire.		12 response.	
13 A. Yeah.		13 BY MR. RUGGIER:	
14 Q. And what happened when he struck your rear		14 Q. So when the vehicle strikes you, can you give	
15 tire?		15 me a little more detail as to exactly what happens to	
16 A. I wrecked and I started sliding on the tracks.		16 the bike and then where you go?	
17 Well, here, do you want to see the video? Do you want		17 A. The bike slid on the tracks. If you'll look	
18 to watch the video?		18 on Google maps, you'll see the area, the place where it	
19 Q. If you've got a video of the actual -- when he		19 happened, all right, and you can actually visually see	
20 actually struck you --		20 the train track, the things that go up under the tracks.	
21 A. Not when he struck. You asked me --		21 What are they called? The logs that go under the	
22 Q. -- I'd be very interested to see that.		22 tracks?	
23 A. You just asked of what happened after he		23 Q. Okay. Yeah.	
24 struck me.		24 A. The fifth one down sticks up like an inch and	

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<p>1 a half, two inches higher than the rest of them. I 2 guess it had been dug out or whatever, but I was sliding 3 on the tracks. The bike laid on its side, and I was 4 going to get on the bike, on top of it, ride it out and 5 jump off of it. You know what I mean? Instead -- 6 Q. No, wait. No, I don't know what you mean. 7 A. Instead of -- to control the bike, I mean, and 8 control myself from getting hurt. If the bike's 9 laying -- it's sliding on its side, you -- my instinct 10 is to jump on top and make sure that I'm sitting on top 11 of the bike so that I can actually jump off of the bike 12 instead of flopping and flipping with the bike 13 instinctively. 14 Q. All right. So when the cruiser hits your back 15 tire, where does it send your bike? 16 A. Laying flat on the tracks. 17 Q. Laying flat onto the track and skidding? 18 A. Sliding, yeah. I was, I mean, in the middle 19 of explaining. 20 And then my rear pegs, they stick out like 21 this (demonstrating). I mean, for the rear foot pegs, 22 they stick out at an angle. Well, the -- I guess you'd 23 say the left side of the rear peg caught on that. It 24 was, like, the fifth railroad timber, and it catapulted</p>	<p>Page 17</p> <p>1 A. Yeah. I mean, they did -- 2 Q. The first kick. We were talking about the 3 first kick. 4 A. Like, no, I don't think so, but it shows both 5 of them right at me, like, immediate. The lady was 6 right behind them. It was immediate. 7 Q. Well, what I'm saying is I've watched that 8 video a lot, and I've never seen them -- I didn't see 9 that you could see where an officer kicked you, and I'm 10 asking if you could -- have you seen in that video where 11 an officer kicked you? 12 A. No, but he kicked me and rolled me over back 13 on my back. It's... Because of that stagnate water, I 14 mean, nobody wants to lay. It's got that nasty grease 15 in it, so I was getting up to get out of it, but.. 16 Q. So my understanding is what you're saying is 17 the cruiser hits your tire, it kind of sends your bike 18 skidding on the railroad tracks. You kind of jump off 19 the bike, land on the tracks, roll into the water and 20 are going to get up to get out of the greasy water. 21 Officer comes over, kicks you, and you go back down in 22 the water? 23 A. He rolls me -- like when you're on your back, 24 you roll over to stand up, right? You use your -- put</p>
<p>1 me. It slammed it. It stopped the bike and made it 2 flip over, and that's when I flipped and landed on the 3 tracks. Well, bounced off the tracks into the puddle, 4 mucky water, whatever it is. 5 Q. So you actually first hit the tracks, and then 6 went from the tracks -- 7 A. I mean, I don't remember exactly, but, I 8 mean, I know when I came -- because it knocked me out. 9 I mean, that's when I was knocked out. And then I woke 10 up, I was laying in the puddle of the greasy water. 11 I went to stand up, went to roll over, because 12 I was laying on my back. I went to roll over and stand 13 up, and I don't know which officer it was came up and 14 kicked me over and rolled me back over onto my back. 15 That's when I stated my name, my birth date, and they 16 started macing me. 17 Q. On that video can you see the officer kick 18 you? 19 A. No. You can see -- it's... 20 Q. Is it just right after that? 21 A. Like it's -- 22 MR. diTRAPANO: I'm just going to object to 23 the form of the question. I don't know what time, which 24 time they kicked him.</p>	<p>Page 18</p> <p>1 your hands and knees up. While I was in that position, 2 and, yeah, he kicked me and rolled me back over onto my 3 back and started macing me. 4 Q. All right. So when you first hit the water, 5 you were able to get up? 6 A. Yeah. 7 Q. And you were able to move your legs. 8 A. Yes. 9 Q. Okay. 10 A. And I remember distinctly when they both 11 grabbed me and that initial jerk, when they first jerked 12 me, I was like I couldn't feel nothing after that. I 13 mean, it was -- it scared the hell out of me. 14 Q. When -- so and then -- 15 A. After them macing me. 16 Q. The officers come over and kick you once as 17 you're trying to get up. You can move and feel your 18 legs at that point. 19 A. Yes, sir. I was trying to -- I was going to 20 stand up. 21 Q. After that kick, after that first kick, you 22 could still feel and move your legs. 23 A. Yeah. I was -- yeah. 24 Q. All right. Then what happens after that?</p>

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1 A. Well, you seen they both grabbed up under --
 2 when they got done macing me, they both grabbed up under
 3 each shoulder and jerked me, I mean.
 4 Q. All right. So what I'm trying to find out is
 5 at what point could you stop feeling your legs?
 6 A. When they initially jerked me (demonstrating).
 7 Q. When they initially jerked you.
 8 A. Yeah, to drag me across the tracks.
 9 Q. So you believe that when --
 10 A. At the time they were saying, "We're just
 11 going to leave you to die." I mean, I honestly wish
 12 that you could hear the audio because it was -- after I
 13 quit -- after I lost the feeling in my legs, I gave up.
 14 I mean, I basically said, "I wish you would. I wish you
 15 would have done it." I mean, because it -- it was
 16 devastating.
 17 Q. So just I want to be clear about this. The
 18 events which you think caused your paralysis was when
 19 the officers went to pick you up.
 20 A. That's not I think. I know. I mean, because
 21 I felt my legs before then, didn't feel them after.
 22 Q. Okay. Your testimony is that the actions of
 23 the officers that caused your paralysis was when they
 24 went to pick you up.

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1 My question is: At what point exactly could
 2 you no longer feel your legs?
 3 A. Exactly? I can't tell you because I had just
 4 been knocked out.
 5 Q. Okay.
 6 A. I came to. I knew that I could feel them
 7 because I was in the middle of standing up when he came
 8 over and kicked me.
 9 Q. Right. So at the time before he kicks you,
 10 could you feel your legs?
 11 A. Yes. I was in the middle of trying to stand
 12 up.
 13 Q. All right. After he kicks you, right after he
 14 kicks you, you can still feel your legs. Is that
 15 correct or not?
 16 A. Yeah. Because I was kicking them. When they
 17 were macing me, I was kicking my legs trying to move up
 18 out of the water.
 19 Q. Okay. So we know that it wasn't the kick that
 20 caused your paralysis. We know it wasn't the accident
 21 that caused you to no longer feel your legs; is that
 22 accurate?
 23 A. Yeah.
 24 Q. And we know, according to your testimony, that

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1 A. When they picked me up and was dragging me.
 2 Q. Okay. Well, so --
 3 MR. diTRAPANO: I'm just going to object to
 4 the form because he doesn't know -- I mean, he can't say
 5 when he was paralyzed or not. All he can say is what
 6 the sensation was.
 7 A. Yeah.
 8 MR. RUGGIER: Whether he feels his legs. I
 9 understand.
 10 A. I know that I was capable of getting up
 11 beforehand. It was, like, right before they kicked me,
 12 rolled me over and started macing me, I was capable of
 13 getting up and moving, I mean.
 14 Q. Right. But what I'm trying -- you understand
 15 I'm trying to pinpoint when you were unable to no longer
 16 feel your legs and what action was taken by the
 17 officers --
 18 A. Okay.
 19 Q. -- if at all, to make you no longer be able to
 20 feel your legs.
 21 A. For one, an officer's not supposed to touch
 22 someone after -- they're supposed to make sure my neck's
 23 stable and I'm in a stable position, correct?
 24 Q. Sure, but that's just not my question, buddy.

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1 it wasn't the first kick which caused you to no longer
 2 feel your legs, correct?
 3 A. Yeah.
 4 Q. Okay. So was it when the officers picked you
 5 up, that's what caused you to no longer be able to feel
 6 your legs?
 7 A. According to what my doctor said is when they
 8 grabbed me, it's like grabbing -- taking a rubber band
 9 and stretching it until it snaps.
 10 Q. I'm not asking about what your doctor told
 11 you.
 12 A. Well, that's what I'm explaining.
 13 Q. What I'm asking is when you could no longer
 14 feel your legs.
 15 A. That's what I'm telling you. I could no
 16 longer feel my legs when they picked me up. I was
 17 explaining you know when you snap a rubber band?
 18 Q. Yeah.
 19 A. Well, that's when it happened is when they
 20 jerked me. When they jerked me and pulled me across the
 21 tracks, that's when I could no longer feel my legs.
 22 Q. Was it that you could no longer feel your legs
 23 prior to being dragged across the tracks, or was it you
 24 could no longer feel your legs after?

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<p style="text-align: right;">Page 25</p> <p>1 A. I could not feel my legs from when they picked 2 me up.</p> <p>3 Q. Okay.</p> <p>4 A. Because I was still kicking my legs in the 5 water while they were macing me.</p> <p>6 Q. So what I'm trying to establish and 7 pinpoint -- and this is your lawsuit; so...</p> <p>8 A. I know.</p> <p>9 Q. It's your lawsuit, but so I get to question 10 you about it. My question is, is what I'm hearing you 11 say, and correct me if I'm wrong, is that when the 12 officers went to pick you up, that was the moment when 13 you could no longer feel your legs.</p> <p>14 A. When they were picking me up, I could no 15 longer feel my legs.</p> <p>16 Q. Okay. So what was that like?</p> <p>17 A. Devastating.</p> <p>18 Q. How so?</p> <p>19 A. What do you mean how so?</p> <p>20 Q. How was it devastating?</p> <p>21 A. Because I'm 31 years old. I've been able to 22 walk my whole life. I do everything. I mean, I help 23 anybody and everybody I can, and now I have to have help 24 to use the bathroom. I have to cath myself four or six</p>	<p>1 A. Well, yes, because I was told not to move, as 2 they were pepper spraying me and telling me they should 3 leave me to die.</p> <p>4 Q. Yeah, but you wanted the officers to pick you 5 up and pull you out of the water.</p> <p>6 A. I wanted them to help me out of the situation 7 they didn't want me in -- or they wanted me in.</p> <p>8 Q. Yeah, but my question, though, is my 9 understanding of your testimony was that because you 10 felt like you were drowning in the water or couldn't 11 breathe --</p> <p>12 A. Because I was told not to move.</p> <p>13 Q. What's that?</p> <p>14 A. Because I was told not to move.</p> <p>15 Q. Right. You had actually requested the 16 officers pick you up out of the water, right?</p> <p>17 A. Yeah.</p> <p>18 Q. So it's both of them that pick you up?</p> <p>19 A. Yeah. It's in the video.</p> <p>20 Q. I know, but I'm not asking about the video. 21 I'm asking what you remember. I understand the videos, 22 and I know it's probably hard to try to separate the 23 two, but...</p> <p>24 A. Yes.</p>
<p style="text-align: right;">Page 26</p> <p>1 times a day.</p> <p>2 Q. So obviously it was a traumatic event. You 3 couldn't walk --</p> <p>4 A. It's the most traumatic event I've ever 5 experienced in my life.</p> <p>6 Q. Sure.</p> <p>7 A. And my grandpa died in my arms when I was 14 8 years old, I mean, so it was pretty traumatic, I mean.</p> <p>9 Q. What's that?</p> <p>10 A. I said my grandpa died in my arms when I was 11 14 years old, and it was more traumatic than that, I 12 mean; so...</p> <p>13 Q. Your previous testimony was that you were 14 drowning in the water?</p> <p>15 A. Trying to prevent from drowning.</p> <p>16 Q. Trying to prevent. You were trying to move 17 around?</p> <p>18 A. It was a deep puddle, pretty deep.</p> <p>19 Q. It was like three feet deep?</p> <p>20 A. I can't -- I don't know exactly, I mean, 21 but...</p> <p>22 Q. And you had actually, my recollection, had 23 asked that the officers help you get out of that water, 24 correct?</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. I'm asking kind of what you remember without 2 the video.</p> <p>3 A. The video has nothing -- everything I'm 4 telling you is from my memory. The video, excuse my 5 language, but the video, I mean, it's -- and actually 6 constantly having to relive it, I mean, it's pretty 7 traumatic too.</p> <p>8 Q. Sure. I'm sure.</p> <p>9 So you're dragged across the tracks. You're 10 picked up and dragged across the tracks, right?</p> <p>11 A. Yeah.</p> <p>12 Q. And laid down?</p> <p>13 A. Yeah.</p> <p>14 Q. Is that right?</p> <p>15 A. Head stomped, and he jammed his knee into my 16 back too.</p> <p>17 Q. Let me, like I said, let me ask the question. 18 Kind of follow along with the --</p> <p>19 A. Okay. I mean, that's...</p> <p>20 Q. Don't jump ahead.</p> <p>21 A. Sorry.</p> <p>22 Q. Try not to jump ahead, please. It will be 23 easier for both of us if that happens.</p> <p>24 So you're dragged across the tracks. Kind of</p>

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<p style="text-align: right;">Page 29</p> <p>1 tell me what are you thinking? What's happening? What 2 are you feeling? What, you know. 3 A. I'm not really feeling anything other than I 4 know I can't feel my legs and these guys are telling me 5 they should leave me to die. 6 Q. So they're telling you what? What exactly 7 does the officer say? 8 A. "You're a dumbass. We should leave you here 9 to die." 10 Q. "You're a dumbass. We should leave you here 11 to die." 12 A. Yeah. 13 Q. Did you say to them "I'm a dumbass"? 14 A. No. I said that you might as well. 15 Q. What's that? 16 A. I told them they might as well. 17 Q. That they might as well leave you to die? 18 A. Yeah. 19 Q. You never told the officers "I'm a dumbass"? 20 A. No. 21 Q. Never said "Take me to jail" or anything like 22 that? 23 A. (Shaking head.) 24 MR. diTRAPANO: Just answer audibly so she can</p>	<p>1 Q. Two? 2 A. One grabbed me up under each arm, I mean. 3 Q. Yeah. And then they set you down. Are you 4 telling me this is what you remember from the video, or 5 do you remember -- 6 A. This is what I remember, remember. 7 Q. They set you down, and then what happens? 8 MR. diTRAPANO: I'm going to object to the 9 form of the question that that's your words, they set 10 him down. I don't remember them setting him down. 11 Q. How would you say it? However you want to 12 characterize it then. 13 A. They dropped me. 14 Q. They dropped you? 15 A. (Nodding head.) 16 Q. Okay. They dropped you down? 17 A. Yeah. 18 Q. Okay. They dropped you down on the ground, 19 and then what happened? 20 A. I closed my eyes hoping to pass out so that -- 21 I mean, I couldn't breathe because of the mace. 22 Q. Then what happened? 23 A. I closed -- I reckon I passed out because I 24 don't remember anything other than seeing the ambulance</p>
<p style="text-align: right;">Page 30</p> <p>1 get it down. 2 A. No. 3 Q. All right. So the officers lay you down on 4 the other side of the tracks, right? 5 A. Yes. 6 Q. And when they lay you down on the other side 7 of the tracks, what are you thinking? What are you 8 saying? What's happening? 9 A. I'm trying to close my eyes and just pass out 10 and trying not to -- I couldn't breathe because of the 11 mace trapped inside of my helmet, full-face helmet. 12 Q. What's that? 13 A. It was trapped. I had a full-face helmet on, 14 so all that mace just trapped inside of it. 15 Q. Right. Did you ask the officers to take off 16 your helmet? 17 A. No. 18 Q. You did not ask the officers to take off your 19 helmet. 20 A. No. 21 Q. Do you remember if whenever you're taken 22 across the tracks, is there two officers there, one 23 officer there or what? 24 A. There was two.</p>	<p>1 pull up. 2 Q. Okay. You don't remember anything after 3 that? 4 A. Not really. 5 Q. You don't remember the alleged head 6 stomping? 7 A. It's not alleged. But, no, I don't remember 8 it. 9 Q. Did you feel your head being stomped on? 10 A. I was out. 11 Q. You were just passed out? 12 Do you remember saying anything? 13 A. The last thing I remember is telling them they 14 might as well have done what they said they wanted to 15 do. 16 Q. Didn't you tell me that you said your name and 17 Social Security number or something like that? 18 A. That was when I was laying in the puddle of 19 water. 20 Q. Okay. 21 A. I respect officers. I mean, I know it's their 22 job. I always have. I've always been respectful. You 23 can ask any officer that's ever pulled me over. I mean, 24 I'm bluntly honest about anything. I mean, it's...</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q. You said you watched the video. And have you 2 heard the 911 tapes? 3 A. Huh-uh. 4 Q. So when you watch the video, you see the 5 lights and siren of the officers on? Do you see that -- 6 A. Yeah. 7 Q. -- in the video? 8 What do you think about that? Are you saying 9 that the officers just turned their lights and siren on 10 after that when the -- 11 A. As soon as he struck my tire is when I heard 12 the lights -- when I heard sirens. 13 Q. As soon as what? 14 A. As soon as he struck my tire is when I heard 15 the siren. 16 Q. But not before that. 17 A. Not before that. 18 Q. So you're laying there on the ground, and the 19 next thing you remember is what, waking up in the 20 hospital? 21 A. No. 22 Q. You woke up in the ambulance? 23 A. I opened my eyes and seen the ambulance pull 24 in. I went back out. And then I remember waking up --</p>	<p style="text-align: right;">Page 35</p> <p>1 Q. When did you wake back up? 2 A. I don't particularly remember. It was a 3 couple days later I think. 4 Q. At the time of the pursuit, had you taken any 5 amphetamines? 6 A. No, not that I -- huh-uh. I just -- I'd 7 actually just woken up before I left the house. 8 Q. At the time of the pursuit, had you taken any 9 opioids? 10 A. No. 11 Q. At the time of this pursuit, had you smoked 12 any pot? 13 A. No. I had just woken up at the house. 14 Q. Marijuana. I'm sorry. 15 A. I just woke up and left the house. 16 Q. At the time of the pursuit, had you taken any 17 Ecstasy? 18 A. No. 19 Q. The night before the pursuit, had you taken 20 any Ecstasy? 21 A. No. 22 Q. Is that what you do, you take Ecstasy? You 23 don't smoke it, right? Do you know? 24 A. No, I don't know.</p>
<p style="text-align: right;">Page 34</p> <p>1 I think it was 14 or 16 days later in the hospital. 2 Q. So you didn't wake up till two weeks later or 3 something like that? 4 A. Not that I remember. 5 I remember coming to and -- 6 MR. diTRAPANO: Just wait until he asks you a 7 question. 8 THE DEPONENT: I'm sorry. 9 BY MR. RUGGIER: 10 Q. What do you remember? 11 A. Coming to and the lady telling me that I 12 wouldn't be able to walk, but I... 13 Q. What's that? 14 A. Huh? 15 Q. Lady telling you you wouldn't be able to 16 walk? 17 A. Yeah. 18 Q. Who is the lady? The nurse? 19 A. The nurse. 20 Q. What did you think? 21 A. I thought she was lying, and I fell back 22 out. 23 Q. Felt bad? 24 A. Fell back out, went back to sleep.</p>	<p style="text-align: right;">Page 36</p> <p>1 Q. The night before the pursuit, had you smoked 2 any pot or marijuana? 3 A. No. 4 Q. The night before the pursuit, had you taken 5 any opioids? 6 A. No. 7 Q. Do you know what I mean by opioids? 8 A. Yeah. 9 Q. Like OxyContin, anything like that? 10 A. Yeah, I understand. 11 MR. diTRAPANO: I just want to object. I 12 believe these have all been asked and answered in the 13 last phase of the deposition. 14 Q. The night before the pursuit, had you taken 15 any amphetamines? 16 A. No. 17 Q. Smoked any meth the night before the 18 pursuit? 19 A. No. I said I had just woken up before the 20 pursuit. 21 Q. I'm asking about the night before the pursuit. 22 A. If I had done it the night before the pursuit, 23 I wouldn't have woken up. I'd have been still been up, 24 yeah.</p>

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1 Q. Still would have been partying?		1 Q. Chelsea what?	
2 A. I guess, if that's what you call it.		2 A. Pickens.	
3 Q. Do you remember anything else about the		3 Q. Who is Chelsea Pickens?	
4 accident, the pursuit? Anything before we get to the		4 A. She's a friend of mine.	
5 hospital? Anything like along those lines? Anything		5 Q. Are you saying Higgins?	
6 else you haven't told me about?		6 A. Pickens, P-I-C-K-E-N-S.	
7 A. Not really.		7 Q. And do you have Chesea's phone number?	
8 Q. Anything else that you recall?		8 A. She doesn't have a phone, that I know of.	
9 A. Not really.		9 Q. Is she employed?	
10 Q. Where was it you were going to? You were		10 A. I'm not sure if she still is because she's	
11 going to Blizzard's?		11 pregnant now, but she did work at the Best Way Inn, I	
12 A. Ronnie Blizzard's.		12 think.	
13 Q. Ronnie Blizzard's. He gave you some cables,		13 Q. Used to work at the Best Way Inn?	
14 clutch cables?		14 A. Or the old Motel 6.	
15 A. A single clutch cable..		15 Q. Where?	
16 Q. If I talked to Ronnie, would he --		16 A. The old Motel 6 in Kanawha City, but I think	
17 A. He just passed away actually.		17 she quit because she got pregnant.	
18 Q. He died?		18 Q. What did she do there?	
19 A. Yeah. Two days ago.		19 A. She was a housekeeper or whatever.	
20 Q. How old is he?		20 Q. Housekeeper.	
21 A. He's mid 40's.		21 A. I can give you the phone number I did have for	
22 Q. What did he die of?		22 her.	
23 A. Some type of cancer or something. He had --		23 Q. Cool. I'll take it.	
24 he was all messed up. He had a tumor in his		24 A. It's 304-590-4193.	
	Page 38		Page 40
1 bellybutton. It was like that big around		1 Q. Thank you.	
2 (demonstrating). He was bad off.		2 (Whereupon, there was an off-the-record	
3 Q. Does he have a son or anything that was		3 discussion.)	
4 running the business now?		4 BY MR. RUGGIER:	
5 A. It's -- there's Ronnie Blizzard and Ronnie		5 Q. Why would Chelsea Pickens know that you were	
6 Blizzard, Jr. I was going to Jr.'s house.		6 going out to Blizzard's to get clutch cables?	
7 Q. You were going to Jr.'s house?		7 A. She was dating Ronnie at the time, and she	
8 A. Yeah. Ronnie Blizzard, his son, Ronnie -- the		8 told me that he had some that he'd give me.	
9 actual Ron -- the old man that owns Blizzard's, I was		9 Q. Okay. She was dating Ronnie Blizzard at the	
10 going to his house -- not his house; his son's house,		10 time?	
11 which is also named Ronnie Blizzard.		11 A. (Nodding head.)	
12 Q. So which one died?		12 Q. Yes?	
13 A. His son, where I was going.		13 A. Yes.	
14 Q. The one you were going to see?		14 Q. And you'd gone out to Blizzard's before?	
15 A. Yeah.		15 A. Once or twice.	
16 Q. Would the old man know that the son was giving		16 Q. A lot of times or just once or twice or	
17 you some clutch cables?		17 what?	
18 A. No, not really. They didn't get along.		18 A. Once or twice.	
19 Q. Would there be anybody else who could confirm		19 Q. And so the whole time during this police	
20 that you were receiving some clutch cables from Ronnie		20 pursuit, it's your intention to go to Ronnie Blizzard's?	
21 Blizzard?		21 You're not actually running from the police, you're just	
22 A. Yeah.		22 driving to Ronnie Blizzard's?	
23 Q. Who?		23 A. I was driving to Ronnie Blizzard's, yes.	
24 A. Chelsea Pickens.		24 Q. The entire time. The route that you took	

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<p style="text-align: right;">Page 41</p> <p>1 during the pursuit would be the normal route that you 2 would take to get to Ronnie Blizzard's house? 3 A. Yeah. Until I got on Trace Fork, I actually 4 passed Ronnie's because, like I said, I was -- it was 5 intimidating. He didn't have his lights on at the time. 6 There was no... 7 Q. So -- 8 MR. diTRAPANO: I think we're confused here. 9 I'm just going to object to the form of that question 10 because I think it's -- I think you're -- I mean, Duane, 11 if you don't mind, I mean, clean up for him when he was 12 going to -- obviously going to Ronnie Blizzard's place 13 was on Trace Fork out there. When he went down and 14 started going through all the thing, he wasn't going to 15 Ronnie Blizzard's house -- or his business. 16 MR. RUGGIER: That's what I'm trying to figure 17 out. 18 BY MR. RUGGIER: 19 Q. Are you saying -- at what point did you turn 20 away and stop from going towards Ronnie Blizzard's house 21 and were simply attempting to flee the police? 22 A. I wasn't actually attempting to flee. I was 23 intimidated. Like he was following at a very close 24 distance. I didn't want to be wrecked. But, yes, I did</p>	<p style="text-align: right;">Page 43</p> <p>1 Q. You ran from the police in 2019? 2 A. Yeah. 3 Q. Why? 4 A. Because I had found a vehicle -- my 5 neighbor -- one of my mom's neighbor's vehicle had been 6 stolen. I found it abandoned with the keys in the 7 ignition, and I guess... 8 Q. You've got to speak up. 9 A. I was returning the vehicle to her, and they 10 tried to pull me over because the tags came back stolen, 11 and I guess she didn't call and let them know that I had 12 found the vehicle. 13 Q. You found your friend's vehicle and were 14 driving it, and the police -- you were returning that 15 car to her, and the police were following you, and you 16 tried to flee from the police; is that right? 17 A. Yes. They got behind me, and I didn't have a 18 license. 19 Q. Speak up. 20 A. I'm in pain; so the more pain I'm in, the 21 lower I speak. 22 Q. She's got to hear you, though. 23 A. But, yeah, they got behind me and turned the 24 lights on and, yes, I fled.</p>
<p style="text-align: right;">Page 42</p> <p>1 pass Ronnie Blizzard's house at the time or during. 2 Q. You don't know where Ronnie Blizzard lives, do 3 you? 4 A. Yes, I do. 5 Q. I know. You don't know his address? 6 A. No, not really. 7 Q. Is it where Blizzard's Custom Cycles is? 8 A. No. It's on Trace Fork. 9 Q. So you passed it on Trace Fork. 10 A. Yeah. 11 Q. And kept going. 12 A. (Nodding head.) 13 Q. Yes? 14 A. Yes. 15 Q. And your testimony is that you weren't fleeing 16 the police, you were just intimidated by the police so 17 kept going? 18 A. Yes. 19 Q. I apologize if I asked you this before, but 20 have you ever run from the police before? 21 A. Yes. Once before. 22 Q. When was that? 23 A. I'm not really -- 2019. I don't remember 24 exact.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. And you fled. 2 Would you say you're no longer taking drugs? 3 A. No. 4 Q. But you didn't go through any treatment 5 program, correct? 6 A. No. The time I spent in the hospital helped 7 me detox. 8 Q. When did you first tell anyone that you were 9 bumped by the police cruiser and that caused you to 10 wreck? 11 A. I really don't remember. 12 Q. When did you first seek an attorney? 13 A. I don't remember that either. 14 Q. Have you had any incidents of OD'ing since the 15 incident? Since the wreck? 16 A. Yes. 17 Q. When? 18 A. A month or so ago. 19 Q. You overdosed, correct? 20 A. Yes. 21 Q. On what? 22 A. Prescribed OxyContin. And I guess -- 23 Q. What's that? 24 A. I said prescribed OxyContin, and I guess I</p>

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<p>1 took a bunch of -- well, some Melatonin because I have 2 really bad trouble sleeping, I mean.</p> <p>3 Q. So you took some OxyContin and some 4 Melatonin?</p> <p>5 A. Yeah.</p> <p>6 Q. And that's what caused you to overdose?</p> <p>7 A. I mean, I guess so.</p> <p>8 Q. It wasn't -- is the OxyContin prescribed?</p> <p>9 A. Yeah.</p> <p>10 Q. And you're saying that the taking of the 11 OxyContin combined with the Melatonin is what caused you 12 to overdose?</p> <p>13 A. I'm not sure exactly what caused me to 14 overdose honestly.</p> <p>15 Q. Well, was it taking an excessive amount of 16 OxyContin?</p> <p>17 A. No. Because I was -- my prescription got 18 stolen while I was in the hospital, and I had found 19 one -- someone that was prescribed the same thing, and 20 they gave it to me, and I guess it wasn't what it was.</p> <p>21 Q. All right. So your prescription, so, like, 22 you're talking about some pills?</p> <p>23 A. Yeah.</p> <p>24 Q. Was stolen when you were in the hospital?</p>	Page 45	<p>1 A. So I knew somebody that was prescribed the 2 same medication, and he give me one, and I guess it 3 wasn't what it was. It was, I guess, the Fentanyl, 4 whatever, how they make the -- I looked it up. It was 5 they were making Fentanyl pills that looked like Roxies, 6 which is the same thing I was prescribed too.</p> <p>7 Q. So you took some Fentanyl?</p> <p>8 A. It was a Roxy 30 is what it was presumed to 9 be, I mean.</p> <p>10 Q. A Roxie 30?</p> <p>11 A. Which is OxyContin 30 milligram.</p> <p>12 Q. And so what does that mean? What does that 13 have to do with the Fentanyl?</p> <p>14 A. They're making them.</p> <p>15 Q. Is it they cut the OxyContin with Fentanyl?</p> <p>16 A. I've seen on Drugs, Inc. they're making pills 17 out of Fentanyl to look like actual pills.</p> <p>18 Q. Okay. Doesn't that stuff kill you, or can it 19 kill you?</p> <p>20 A. Yeah, I guess so. I mean, but I had no clue 21 that it was, I mean.</p> <p>22 Q. All right. Well, so you're in the hospital. 23 How long are you in the hospital for? Do you 24 remember?</p>	Page 47
<p>1 A. Yeah. I had to go to get a stent removed from 2 my kidneys.</p> <p>3 Q. And when your prescription in the hospital --</p> <p>4 A. Well, it was sitting on my dresser beside my 5 bed. I left it and came back, and they were gone.</p> <p>6 Q. When you were in the hospital, were you giving 7 the OxyContin to yourself?</p> <p>8 A. No. I left it. I left it on the bedside 9 table.</p> <p>10 Q. Well, yeah, but doesn't the hospital bring the 11 drugs in to you?</p> <p>12 A. That's what I'm saying. I left my 13 prescription on my bedside table.</p> <p>14 MR. diTRAPANO: At home.</p> <p>15 A. At home.</p> <p>16 Q. Okay. And somebody at your home stole your 17 prescription? Somebody at home stole a prescription?</p> <p>18 A. Yeah.</p> <p>19 Q. Do you know who it was?</p> <p>20 A. I have no clue.</p> <p>21 Q. And so when your prescription was stolen, what 22 did you do? Did you go and get another prescription?</p> <p>23 A. They wouldn't give me another prescription.</p> <p>24 Q. So --</p>	Page 46	<p>1 A. It was a little over a week and a half.</p> <p>2 Q. In the hospital. And you are told in the 3 hospital that you're paralyzed?</p> <p>4 A. Which time are you talking about?</p> <p>5 Q. The first time you were told.</p> <p>6 A. Are you talking about after the wreck or...</p> <p>7 Q. Yeah, after the wreck. I'm not talking about 8 this other one.</p> <p>9 A. I was in there 28 days.</p> <p>10 Q. Okay. In the hospital 28 days. Which 11 hospital? Were you in General?</p> <p>12 A. General.</p> <p>13 Q. Well, tell me about it. When you wake up, 14 what happens?</p> <p>15 A. I woke up. I don't know if it was, like, 14, 16 16 days. She told me I was paralyzed. I went back out, 17 and I don't remember -- I remember, like, the day before 18 I got out, they told me if I had a bowel movement, that 19 I'd be released, and that evening I had a bowel 20 movement.</p> <p>21 Q. So they told you you were paralyzed?</p> <p>22 A. Yeah.</p> <p>23 Q. And what did you think?</p> <p>24 A. I didn't want to believe them.</p>	Page 48

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<p style="text-align: right;">Page 49</p> <p>1 Q. Okay. Were you -- you know, obviously that's 2 some pretty devastating news, right? 3 A. Yeah. Like I said, I was asleep 90 percent of 4 the time I was in there, either asleep or I'm not sure 5 exactly. 6 Q. Right. What else do you remember about being 7 in the hospital other than being asleep? 8 A. Nothing really. 9 Q. Not much? 10 A. I remember the first time I tried to sit up, I 11 fell completely forward. I had no trunk strength in 12 me. 13 Q. You fell completely forward? 14 A. Well, they didn't let me fall completely 15 forward. 16 Q. Somebody was there, right? 17 A. I was trying to look at my toes, and I 18 couldn't support myself. 19 Q. You tried to sit up in the bed you're 20 saying? 21 A. I sat up in the bed with my legs hanging off 22 the side of the bed. I went to look at my toes, and I 23 just kept... 24 Q. Just kept going down?</p>	<p style="text-align: right;">Page 51</p> <p>1 Q. So who came and picked you up? 2 A. My dad. 3 Q. Did they give you a wheelchair? 4 A. Yeah. 5 Q. And you left the hospital? 6 A. Yes. 7 Q. So tell me what happens when you leave. 8 A. I went to -- ended up moving -- 9 Q. Speak up. 10 A. Ended up moving in with my mom because me and 11 my dad had a falling out. 12 Q. Did you move in with your dad first? 13 A. He picked me up, and I went to my mom's 14 house. 15 Q. You told me. What's your mom's name? 16 A. Tonya Devitt, D-E-V-I-T-T. 17 Q. If you need to take a break at any time, let 18 me know, by the way. 19 A. (Shaking head.) 20 Q. So you go to her house. Where does she 21 live? 22 A. At the time she was staying with a friend on 23 South Ruffner. 24 Q. And what happens when you get there?</p>
<p style="text-align: right;">Page 50</p> <p>1 A. Yeah. 2 Q. Because you had no strength in your trunk? 3 A. Yeah. 4 Q. So did they give you any therapy while in the 5 hospital? 6 A. I was out the whole time. I mean, I don't 7 really know. I transferred -- the day that I set up 8 first, they showed me how to transfer. 9 Q. What's that? 10 A. I said that the day that I set up, they showed 11 me how to use a transfer board and told me if I had a 12 bowel movement, I could leave. And I had a bowel 13 movement. I called my dad and told him to come get 14 me. 15 Q. So you didn't have any real therapy in the 16 hospital. 17 A. No. 18 Q. They said if you had a bowel movement, then 19 you could leave? 20 A. Yeah. 21 Q. And you had a bowel movement so you left. 22 A. (Nodding head.) 23 Q. Yes? 24 A. Yes.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. Nothing really. I mean, I stayed there for a 2 couple weeks. 3 Q. Did you get in the bathroom? 4 A. No. I have to rent a hotel room to get in a 5 bathroom to take a shower because I don't have a 6 handicap accessible shower. 7 Q. What about how to go -- can you get onto and 8 off of the toilet? 9 A. No, I can't. I can't. I have to be digitally 10 stimulated, like, literally have to dig. 11 Q. What about peeing? 12 A. I have to cath myself. 13 Q. Okay. 14 A. Well, at the time I had a Foley bag. 15 Q. How long did you have a Foley bag? 16 A. I can't tell you exactly how long. 17 Q. So you go to your -- your dad takes you to 18 your mom's, and you live at your mom's for a couple 19 weeks? 20 A. Yeah. 21 Q. And then where do you go? 22 A. Ended up my mom had to leave where she was, so 23 we went and stayed with one of our friends. 24 Q. Stayed with what?</p>

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<p style="text-align: right;">Page 53</p> <p>1 A. With the lady that owned the vehicle that 2 was -- that I had flipped when the police -- we ended up 3 moving in with her.</p> <p>4 Q. Who's that?</p> <p>5 A. Leslie Swift.</p> <p>6 Q. How long did you live with Leslie Swift?</p> <p>7 A. Maybe a month.</p> <p>8 Q. Where does she live?</p> <p>9 A. South Ruffner.</p> <p>10 Q. All right. Go to Leslie Swift's house. Do 11 you know her phone number?</p> <p>12 A. No, I don't.</p> <p>13 Q. So how did you go to Leslie Swift's? Was it 14 accessible or what?</p> <p>15 A. It was a struggle. I was homeless, I mean. 16 It was a big struggle. That's why I stayed in the 17 hospital most of the time.</p> <p>18 Q. So you go to Leslie Swift's house. How long 19 are you at Leslie Swift's house?</p> <p>20 A. About a month.</p> <p>21 Q. Where did you go next?</p> <p>22 A. I ended up going -- my friend's mother died, 23 and he let me stay at his home because he moved into his 24 mom's house.</p>	<p style="text-align: right;">Page 55</p> <p>1 A. Huh?</p> <p>2 Q. How do you have money?</p> <p>3 A. I don't have the money. I was looking to buy 4 it. He was being generous enough to let me stay.</p> <p>5 Q. That's not what I'm saying. Like how would 6 you get money to buy the house?</p> <p>7 A. I didn't have -- at the moment I didn't have a 8 clue. I mean, I was just hoping something would come 9 along.</p> <p>10 Q. All right. So that was in December you were 11 in the hospital of 2020, and then so where do you go 12 after that?</p> <p>13 A. I go to my grandmother's house.</p> <p>14 Q. Go to your grandma's house. What's your 15 grandma's name?</p> <p>16 A. Helen Lacy.</p> <p>17 Q. What?</p> <p>18 A. Helen Lacy.</p> <p>19 Q. All right. And where does Helen live?</p> <p>20 A. Nitro.</p> <p>21 Q. Does she live with anybody?</p> <p>22 A. My uncle takes care of her.</p> <p>23 Q. What?</p> <p>24 A. My uncle takes care of her.</p>
<p style="text-align: right;">Page 54</p> <p>1 Q. Who is your friend's mother?</p> <p>2 A. I'm not sure. Snodgrass was the last name.</p> <p>3 Q. Who is your friend?</p> <p>4 A. Eddie Snodgrass.</p> <p>5 Q. Eddie Snodgrass. So you stayed at Eddie 6 Snodgrass's house for how long?</p> <p>7 A. A couple months, then I went to the hospital 8 the whole month of December.</p> <p>9 Q. Then went to the hospital?</p> <p>10 A. Yeah, the whole month of December because I 11 had a bad infection.</p> <p>12 Q. December of what?</p> <p>13 A. Last year.</p> <p>14 Q. 2020?</p> <p>15 A. Yeah. And while I was in the hospital, my 16 house burnt down on Christmas.</p> <p>17 Q. When you were in the hospital, your house 18 burns down?</p> <p>19 A. Yeah.</p> <p>20 Q. Well, whose house?</p> <p>21 A. It was Eddie's. I was looking to buy it from 22 him, but...</p> <p>23 Q. How would you buy it? How do you have any 24 money?</p>	<p style="text-align: right;">Page 56</p> <p>1 Q. What's his name?</p> <p>2 A. Bradley Means.</p> <p>3 Q. And are you still living there?</p> <p>4 A. No. Back with my father.</p> <p>5 Q. How long did you live with Helen?</p> <p>6 A. A month and a half, two months.</p> <p>7 Q. And then you moved with your dad?</p> <p>8 A. Yeah.</p> <p>9 Q. Now you're back with your dad?</p> <p>10 A. Yes.</p> <p>11 Q. Where does he live?</p> <p>12 A. North Charleston.</p> <p>13 Q. What's the address?</p> <p>14 A. 2615 6th Avenue.</p> <p>15 Q. What's your dad's phone number?</p> <p>16 A. 964-1431.</p> <p>17 Q. 964-1431?</p> <p>18 A. Yeah.</p> <p>19 Q. And your dad, does he own a business?</p> <p>20 A. Yes.</p> <p>21 Q. Absolute Contracting?</p> <p>22 A. Yeah.</p> <p>23 Q. Does he still do that?</p> <p>24 A. Yeah.</p>

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1 Q. And that business is out of his house, isn't		1 on each leg, like, down my calf and one on my ankle.	
2 it?		2 Q. So if you lay in the bed, it's better? It	
3 A. Yeah. He has a contractor business.		3 avoids pressure ulcers?	
4 Q. Well, that's what I'm saying. Does he work		4 A. Yeah. I can roll back and forth. I'm not	
5 out of his house or does he have an office?		5 supposed to sit up like this in a wheelchair. I mean,	
6 A. Yeah, out of his house.		6 it causes them.	
7 Q. What's that?		7 Q. Try and move around?	
8 A. Out of his house.		8 A. Yeah. Rolling side to side, back and forth	
9 Q. What does he build?		9 every two hours.	
10 A. Anything.		10 Q. What do you mean? What, in your wheelchair	
11 Q. All right. So you're living with your dad.		11 you try to move back and forth?	
12 And how is life living with your dad?		12 A. In my bed.	
13 A. It's not pleasant.		13 Q. What's that?	
14 Q. Why?		14 A. In my bed.	
15 A. Because we've never gotten along.		15 Q. In your bed.	
16 Q. What is that?		16 So what do you do to strengthen your trunk?	
17 A. We've never gotten along.		17 Anything?	
18 Q. All right. Why have you not ever got along		18 A. What do you mean? I've got 11 inches of rods	
19 with your dad?		19 in my back. There isn't much I can do in the strength	
20 A. Because he's a toad. He's just a different		20 of my trunk.	
21 breed. He's a money hungry type of person.		21 Q. Can you do this (demonstrating)?	
22 Q. He's what, money hungry?		22 A. I mean, yeah.	
23 A. Yeah.		23 Q. What's that?	
24 Q. Was your doing drugs an issue with your		24 A. Yeah. I can do pull-ups with my trapeze	
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1 father?		1 too.	
2 A. No.		2 Q. (Demonstrating). Did you see what I just	
3 Q. Really?		3 did?	
4 A. Really.		4 A. Uh-huh.	
5 Q. Your dad wasn't bothered that you were doing		5 Q. Do that.	
6 drugs?		6 A. (Demonstrating.)	
7 MR. diTRAPANO: I'm going to object to the		7 Q. That will help strengthen your trunk.	
8 form of the question.		8 Can you lean forward?	
9 A. I mean, he didn't really know. We never		9 A. No. That's as far as I can lean	
10 really spent any time together because we don't get		10 (demonstrating).	
11 along.		11 Q. You can't lean forward at all?	
12 Q. So how do you live at your dad's house? I		12 A. No.	
13 mean, what kind of house is it? In other words, how do		13 Q. Can you, like, just do like this	
14 you, in a wheelchair, get around in your dad's house?		14 (demonstrating) just back and forth?	
15 A. I lay in my bed most of the time.		15 A. I just did as much as I -- as far as I can	
16 Q. Can you get up out of bed?		16 go.	
17 A. Yeah, but I don't really because of the		17 Q. Because of the rods in your back?	
18 pressure ulcers.		18 A. Yeah.	
19 Q. Because what?		19 Q. Can you push up at all?	
20 A. I have pressure ulcers.		20 A. Yeah.	
21 Q. Your pressure ulcers, where are your pressure		21 Q. Let me see.	
22 ulcers?		22 A. (Demonstrating.) I mean, I could do more, but	
23 A. I've got one on my coccyx and bilateral on		23 I'm hurting right now. I've been sitting up longer than	
24 each butt -- bottom of each butt cheek, and I've got two		24 I'm supposed to be, I mean.	

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1 Q. You can transfer in and out of your		1 A. Watch TV. I get up occasionally.	
2 wheelchair?		2 Q. What's that?	
3 A. Most of the time. My dad helps me other		3 A. I said I get up occasionally and sit out on	
4 times.		4 the porch, but it's not very often.	
5 Q. You don't use the toilet?		5 Q. Are you able to transfer from your bed to your	
6 A. (Shaking head.)		6 wheelchair?	
7 Q. Right?		7 A. Sometimes. I mean, my hips hurt a lot. I	
8 A. No.		8 mean, it's not -- it's unexplainable.	
9 Q. You've got to cath yourself?		9 Q. What's that?	
10 A. Yeah.		10 A. It's unexplainable as to what -- the way my	
11 Q. You have to cath yourself to pee, and you've		11 hips feel. I mean, it's... I don't know.	
12 got to have digital stimulation in order to have a bowel		12 Q. Well --	
13 movement.		13 A. Sometimes I can transfer and not be afraid of	
14 Who gives you -- do you give yourself digital		14 doing it, and sometimes others is just...	
15 stimulation?		15 Q. Sure. And then other times you can't	
16 A. My aunt does it for me.		16 transfer.	
17 Q. Your aunt does?		17 A. I need help.	
18 A. Yeah.		18 Q. Sometimes you can transfer and sometimes you	
19 Q. Who's your aunt?		19 can't, right?	
20 A. Rebecca Parsons.		20 Have you got a bed rail?	
21 Q. Aunt Rebecca Parsons. Is she a nurse or		21 A. Yeah. It's a medical bed.	
22 anything?		22 Q. It's a what?	
23 A. No.		23 A. Medical bed.	
24 Q. What's her -- do you know her name and number?		24 Q. What does that do?	
	Page 62		Page 64
1 I know her name, but what's her number?		1 A. Provided from the hospital.	
2 A. She doesn't have a phone number.		2 Q. Yeah, what's that do? Does that lift you	
3 Q. How do you get ahold of her?		3 up?	
4 A. My dad just picks her up every other day.		4 A. I mean, it sets me up and lifts my legs up.	
5 Q. Your dad picks her up every -- what, she comes		5 Q. If you're laying down, can you get yourself	
6 over, digitally stimulates you?		6 up? Meaning you're laying down flat like this	
7 A. She comes over. My nurse comes Monday,		7 (demonstrating), can you sit up?	
8 Wednesday, and Friday. She comes Tuesdays, Thursdays,		8 A. No.	
9 Saturday, Sunday.		9 Q. All right. How do you get up then?	
10 Q. The nurse comes Monday, Wednesday, and Rebecca		10 A. My bed lifts me up. It sits up.	
11 comes -- say that again?		11 Q. Oh, the bed sits you --	
12 A. Tuesdays, Thursdays, Saturday, and Sunday.		12 A. It's a medical bed. You know, the back lifts	
13 Q. Who pays for your nurses to come?		13 up and the legs go up.	
14 A. Nobody.		14 Q. Okay. So what else can you tell me about your	
15 Q. Federal government?		15 life? You filed a lawsuit and you're asking a jury to	
16 A. I guess my insurance.		16 pay you money damages. You will be asking a jury to pay	
17 Q. What's that?		17 you money damages, and so what I'm trying to get at is	
18 A. My insurance, I guess. Medicare, whatever.		18 why you're -- what are your injuries that you're going	
19 Q. So the government pays?		19 to tell a jury about? And a doctor is going to testify	
20 A. (Nodding head.)		20 and say things, I understand that, but I'm just saying	
21 Q. Is that a yes?		21 you.	
22 A. Yes.		22 A. Me, my life has come to a halt basically. I	
23 Q. Well, tell me about -- what's your life like?		23 mean, I have no life anymore.	
24 What do you do? You wake up and do what?		24 Q. How so?	

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<p style="text-align: right;">Page 65</p> <p>1 A. I'm limited in my mobility, limited mobility. 2 I mean, constant pain. I can't -- my dog's afraid to 3 jump in the bed with me. He's afraid he's going to hurt 4 me, I mean.</p> <p>5 Q. You're in constant pain?</p> <p>6 A. Yeah.</p> <p>7 Q. What hurts?</p> <p>8 A. My back. My legs feel like elephants are 9 sitting on them, I mean. I guess it's called phantom 10 pains. Mentally.</p> <p>11 Q. Mentally what?</p> <p>12 A. Mentally fucked.</p> <p>13 Q. How are you mentally fucked?</p> <p>14 A. Because I never had to ask anybody for 15 anything.</p> <p>16 Q. What's that? Take your time if you need to. 17 Take your time.</p> <p>18 A. Because I can't shit on my own. Because I 19 can't do anything by myself. I have to ask everybody 20 for everything.</p> <p>21 Q. What else?</p> <p>22 A. What do you mean what else?</p> <p>23 Q. I understand that your life has been affected 24 by this, obviously, but what I'm asking you to do is</p>	<p style="text-align: right;">Page 67</p> <p>1 Q. Everything has changed. 2 A. I can't work no more. I mean, it depresses me 3 that I can't work. It's just there's nothing -- 4 nothing's the same.</p> <p>5 Q. You can't work no more?</p> <p>6 A. Not the work I like to do.</p> <p>7 Q. Well, have you thought about you might have to 8 change that?</p> <p>9 A. What?</p> <p>10 Q. Have you thought about you might have to 11 change that?</p> <p>12 A. I can't climb a ladder. I mean, how could I 13 change that?</p> <p>14 Q. Well, what I'm saying is you might have to -- 15 A. I'll eventually work into figuring out 16 something.</p> <p>17 Q. You've got to look elsewhere. You're not 18 going to be laying bricks anymore or whatever it was. 19 You can't climb ladders, right?</p> <p>20 A. Yeah. I'll eventually work it out. I mean, 21 it's only been a year ago; so...</p> <p>22 Q. Sure. Have you got any plans?</p> <p>23 A. Not at the moment.</p> <p>24 Q. Tri-State Rehab.</p>
<p style="text-align: right;">Page 66</p> <p>1 tell me how your life has been affected. Obviously 2 you're in a wheelchair and obviously you can't walk 3 anymore.</p> <p>4 A. It's been affected fully. I mean, I have no 5 visitors. I mean, nobody -- I mean, how do -- I need to 6 take a break.</p> <p>7 Q. Let's do it.</p> <p>8 MR. diTRAPANO: Let's take a break</p> <p>9 MR. RUGGIER: Take a break.</p> <p>10 (Whereupon, a recess was taken.)</p> <p>11 BY MR. RUGGIER:</p> <p>12 Q. So you were telling me about how bad things 13 were for you and how difficult things are and how you've 14 been damaged by this and how this is problematic 15 obviously, and one of the things you were saying is you 16 have to ask everybody to do everything for you.</p> <p>17 A. Yeah, I do.</p> <p>18 Q. Because you're in the wheelchair and, you 19 know, you can't --</p> <p>20 A. No mobility.</p> <p>21 Q. No mobility. You can't go places, right?</p> <p>22 What else?</p> <p>23 A. And everything in my life has changed 24 completely.</p>	<p style="text-align: right;">Page 68</p> <p>1 A. What is it?</p> <p>2 Q. West Virginia State Rehabilitation. They're 3 often -- they can often help people with disabilities 4 get involved in employment.</p> <p>5 A. I'll work it out eventually, I mean.</p> <p>6 Q. What's that?</p> <p>7 A. I said I'll work it out eventually.</p> <p>8 Q. Well, you've kind of got to. 9 What other ideas do you have for employment?</p> <p>10 A. My dad's wanting me to do the paperwork for 11 his business.</p> <p>12 Q. Are you going to do that?</p> <p>13 A. Maybe. More than likely.</p> <p>14 Q. What?</p> <p>15 A. More than likely will.</p> <p>16 Q. So you can do paperwork for your dad's 17 business. What else can you do?</p> <p>18 A. I haven't thought about it enough yet, I 19 mean.</p> <p>20 Q. How come?</p> <p>21 A. Because I'm still trying to get used to 22 what's --</p> <p>23 Q. Get your mind right?</p> <p>24 A. Yeah.</p>

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<p>1 Q. How long has it been? It's been about --</p> <p>2 A. Almost a year.</p> <p>3 Q. -- almost a year, something like that.</p> <p>4 A. Yeah. I'm going to get all these pressure</p> <p>5 wounds healed up.</p> <p>6 Q. Well, will they heal up?</p> <p>7 A. They should.</p> <p>8 Q. Well, so I don't know. So, I mean, they'll --</p> <p>9 whether they'll heal up. Are you doing stuff to make</p> <p>10 them heal?</p> <p>11 A. I have nurses coming in, and my aunt's taking</p> <p>12 care of them, changing bandages and...</p> <p>13 Q. Well, take me through your day. You know, you</p> <p>14 wake up. You watch TV. What else?</p> <p>15 A. Not much. I mean, I don't really get up that</p> <p>16 much because I don't want my pressure wounds to get any</p> <p>17 bigger. I mean, I want to let them heal like you're</p> <p>18 supposed to, I mean.</p> <p>19 Q. So you're mostly laying in your bed?</p> <p>20 A. Mostly.</p> <p>21 Q. And you're mostly watching TV all day.</p> <p>22 A. Mostly.</p> <p>23 Q. Are you doing anything for your -- are you</p> <p>24 depressed?</p>	<p>Page 69</p> <p>1 do you eat?</p> <p>2 A. Yeah. I've got a normal appetite.</p> <p>3 Q. Have you gained weight, lost weight, what?</p> <p>4 A. I'm not sure. I haven't been weighed since</p> <p>5 the last time I was in the hospital.</p> <p>6 Q. Does your upper body look kind of the same or</p> <p>7 different or what? Do you know?</p> <p>8 A. Different. Not -- I used to be a lot</p> <p>9 skinnier, my upper body.</p> <p>10 Q. Okay. So you used to be thinner?</p> <p>11 A. Yeah.</p> <p>12 Q. What else? What else can you tell me about</p> <p>13 life in the chair?</p> <p>14 A. I don't live life in the chair. I'm afraid of</p> <p>15 pressure wounds. I have to have my pressure wounds</p> <p>16 healed before I get in my chair more. I used to fall</p> <p>17 asleep in my chair. That's the reason I got my pressure</p> <p>18 wounds.</p> <p>19 Q. Well, not just life in the chair, but what</p> <p>20 else can you tell me about your life?</p> <p>21 Can you have sex?</p> <p>22 A. No, I can't.</p> <p>23 Q. What else can you tell me? Got a girlfriend</p> <p>24 or anything?</p>
<p>1 A. Occasionally I just get down sometimes but,</p> <p>2 no, I'm not.</p> <p>3 Q. Are you taking any medication for</p> <p>4 depression?</p> <p>5 A. No.</p> <p>6 Q. Really?</p> <p>7 A. Really.</p> <p>8 Q. No medication for depression at all?</p> <p>9 A. No. I don't feel as I'm depressed. I'm just</p> <p>10 getting used to the hand I've been dealt, I guess.</p> <p>11 Q. What else can you tell me about the hand</p> <p>12 you've been dealt, as you call it? You just basically</p> <p>13 all day long mostly just lay in the bed and watch TV?</p> <p>14 A. Do pull-ups and...</p> <p>15 Q. What's that?</p> <p>16 A. Do pull-ups, try to keep a little bit of upper</p> <p>17 strength. That's basically it.</p> <p>18 Q. Do pull-ups, wait for your nurse to come or</p> <p>19 your aunt to come.</p> <p>20 A. Aunt, yeah.</p> <p>21 Q. Bathroom and whatnot. So can you eat like</p> <p>22 normal?</p> <p>23 A. Yeah.</p> <p>24 Q. Are you hungry? Not right now, but I'm saying</p>	<p>Page 70</p> <p>1 A. No.</p> <p>2 Q. Do you have friends?</p> <p>3 A. Yeah, a couple, but they don't come around.</p> <p>4 Q. Don't see them that much?</p> <p>5 A. No, not really.</p> <p>6 Q. What else can you tell me about your life?</p> <p>7 A. I mean, it's changed. It's not the same.</p> <p>8 It's...</p> <p>9 Q. Can you tell me how your life is not the same?</p> <p>10 I know I kind of asked you that before, but I'm trying</p> <p>11 to get you to tell me a little bit more than what you've</p> <p>12 told me.</p> <p>13 A. There's not much more to tell. I mean, I</p> <p>14 can't do anything. At the moment I'm not capable of</p> <p>15 doing anything until my pressure wounds are healed. I</p> <p>16 mean, I don't. I'm in fear of them getting worse and me</p> <p>17 getting more infections and then going back in the</p> <p>18 hospital.</p> <p>19 Q. Is that what the infections were that stopped</p> <p>20 the depositions the other day or --</p> <p>21 A. No. I was constipated.</p> <p>22 Q. Yeah, that was constipated, but maybe the time</p> <p>23 before. The deposition was canceled because you had</p> <p>24 infection? Is that what we're talking about?</p>

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<p style="text-align: right;">Page 73</p> <p>1 MR. diTRAPANO: Yeah, it's the time he was in 2 the hospital. 3 A. Yeah. 4 Q. Were you in the hospital because of your 5 pressure wounds? 6 A. Yeah. 7 Q. Is that the infection that we're talking about 8 is -- 9 A. No. It was a stent. 10 Q. It was a stent? 11 A. Yeah. I had a kidney stone. 12 Q. Okay. So you had a kidney stone? 13 A. Yeah. 14 Q. Could you feel it? 15 A. No. 16 Q. The kidney stone caused the infection? 17 A. Yeah. That and a UTI where I have to cath 18 myself. Ran out of catheters. I had to boil and reuse 19 catheters. 20 Q. Is there anybody else in the house other than 21 your dad? 22 A. His fiancee. 23 Q. His fiancee? 24 A. (Nodding head.)</p>	<p>1 you? 2 A. I guess. 3 Q. Are you currently getting any kind of 4 psychological counseling or anything like that? 5 A. No. I don't feel as I need it. I'm a strong 6 willed, strong minded person. I can deal with it. My 7 doctors have actually said I've dealt with it a lot 8 better than they've seen a lot of people deal with it, 9 considering the fact. 10 Q. Did you have any career plans before this? 11 A. I was working construction. 12 Q. Just working construction? 13 A. And I was hoping to start a grave digging 14 services. 15 Q. Were you working construction or doing grave 16 digging before this happened? 17 A. In between both really. 18 Q. Kind of in between jobs when this happened? 19 A. Yeah. 20 Q. Are you receiving any kind of benefits right 21 now? 22 A. I just started getting Social Security. 23 Q. What do you get? 24 A. 528 a month.</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. Did you tell me her name already? 2 A. Renee Fuson. 3 Q. Say it again? 4 A. Renee Fuson. 5 Q. How often is she there? Does she live 6 there? 7 A. Yeah. 8 Q. Is she there all day long or what? 9 A. Basically. 10 Q. Is she the one that helps you the most? 11 A. She doesn't help me. She's not capable. 12 Q. Why not? 13 A. Because she's had, like, 32 different 14 surgeries, and she's just a little ol' thing. 15 Q. Why has she had 32 surgeries? 16 A. Carpal tunnel and knee surgeries, surgery on 17 her neck. I don't know. 18 Q. Yeah, but can she help you by whatever? 19 A. She brings me food and drinks. 20 Q. Yeah. She'll bring you food, drinks. She can 21 get something off the shelf if you want it, that kind of 22 thing? 23 A. Yeah. 24 Q. Is she the one that's mostly taking care of</p>	<p>1 Anything else? 2 A. No. 3 Q. What's that? 4 A. No. 5 Q. No other money? 6 You say you were in Charleston General. Had 7 you ever -- what was it, CAMC General? Downtown, is 8 that where it was? 9 A. Yeah. 10 Q. Had you ever been to any other hospitals 11 before? 12 A. Memorial. 13 Q. Why were you at CAMC Memorial? 14 A. My Foley bag got blocked a couple times. 15 Q. Had you ever been anywhere before the 16 accident? 17 A. No, not really. I never went to the 18 hospital. 19 Q. What's that? 20 A. I never really went to the hospital for 21 anything. 22 Q. Do you have any movement in your legs at 23 all? 24 A. No.</p>

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1 Q. What's that?		1 a diaper.	
2 A. No.		2 Q. You've got to wear a diaper? When your dad	
3 Q. How do you get dressed?		3 puts the diaper on you, can you push yourself up?	
4 A. My aunt helps me.		4 A. No. I've got to roll from side to side.	
5 Q. Who does?		5 Q. What about if you push yourself up, though?	
6 A. My aunt or my dad.		6 A. I can't. It doesn't work like that. I have	
7 Q. Somebody has to help you get dressed?		7 to roll from side to side for him to put my diaper on.	
8 A. Yeah.		8 I can't push my hips off the bed. My hips don't work.	
9 Q. How do you get a shower or clean yourself?		9 Q. I thought you pushed yourself up. So you	
10 A. I rent a room, a handicap accessible, that's		10 can't push yourself up?	
11 got a handicap accessible bathroom in it.		11 A. Not in the bed, no, I can't.	
12 Q. You can't take a shower at your dad's house or		12 Q. What's that?	
13 you can't --		13 A. Not in the bed, no, I can't.	
14 A. I'm afraid to get in the bathtub, afraid of		14 Q. Not in the bed?	
15 falling out.		15 A. Not in the bed. And it's -- I never really	
16 Q. Do you --		16 tried to do it in a chair. I don't want to get in my	
17 A. I'd wash myself with a rag. My aunt gives me		17 chair naked.	
18 a soap bath every now and again.		18 Q. What's that?	
19 Q. What's that?		19 A. I never tried to do it in my chair. I don't	
20 A. My aunt will wash me down with a soapy rag.		20 want to get in my chair naked.	
21 Q. You can wash yourself, though, right?		21 Q. I just wonder if it would be easier for you.	
22 A. My hands, my head, and my face, yeah.		22 A. I mean, I don't think it would. It's easier	
23 Q. You can wash your body, right? And you can		23 to roll from side to side.	
24 wash your legs, right?		24 Q. You roll from side to side when you're in the	
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1 A. No, I can't. I mean, I can...		1 bed. Your dad pulls up this side and you pull up that?	
2 Q. Why?		2 A. Yeah.	
3 A. Because I can't really reach my legs if I'm		3 Q. Have you tried to do it yourself?	
4 lying down.		4 A. I can't.	
5 Q. What's that?		5 Q. You can't?	
6 A. I can't really reach that -- I don't reach		6 A. Like I said, I can't reach my feet. I can't	
7 down to my knees.		7 get --	
8 Q. You can reach, like, up to the top. You can		8 Q. Well, yeah. I mean, like, roll, pull up your	
9 reach the top part of your legs.		9 diaper on one side and pull up your diaper on the other	
10 A. Yeah.		10 side? Anything like that to do it yourself?	
11 Q. You can't bend over?		11 A. I have to support myself. I have to hold on	
12 A. No, I can't bend over.		12 to my bed rail as he pulls them up. I have no free	
13 Q. And the reason you can't bend over is because		13 hand. If not, I just flop back.	
14 of the rod in your back?		14 Q. Have you had to pay any money out of pocket	
15 A. Yeah.		15 for your medical treatment?	
16 Q. So you can wash most of your body, right?		16 A. I have no money to pay out of pocket, so no.	
17 A. Some of it, not most of it.		17 Q. Do you keep a diary or anything?	
18 Q. Who got you dressed today?		18 A. No.	
19 A. My dad.		19 Q. Who have you talked to about this incident?	
20 Q. You can't put on shoes or socks or anything		20 A. Family members.	
21 like that?		21 MR. diTRAPANO: I mean, besides your lawyers.	
22 A. No.		22 Q. Not your lawyers.	
23 Q. You can't put on underwear?		23 A. Family members.	
24 A. No. I can't wear underwear. I've got to wear		24 Q. Who?	

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1	A. People in my family.	1	A. (Shaking head.)
2	Q. Right. So who?	2	MR. diTRAPANO: He said no or trying to say --
3	A. Immediate family.	3	A. Oh, yeah, I said no.
4	Q. Which family members?	4	Q. What's that?
5	A. I mean, the ones, I mean --	5	A. No. I didn't say anything else.
6	Q. You've just got to tell me about it. Your	6	Q. Okay. Which doctor told you that?
7	dad. You talk to your dad.	7	A. I'm not sure. It was just literally telling
8	A. Yeah.	8	me that. He was just saying the way it looked, I mean,
9	Q. Who else?	9	the way that the nerves looked, it...
10	A. My dad, my grandma.	10	Q. Who has been your main doctor throughout
11	Q. Your dad and your aunt?	11	this?
12	A. My dad's old lady and my aunt, I mean.	12	A. Family Medicine. I don't really -- they've
13	Q. Your dad's old lady. Renee?	13	had me under, like, five different doctors, but I guess
14	A. Yeah.	14	Dr. Jarrell is the one.
15	Q. Who else?	15	Q. Dr. Jarrell? Is he what, the main doctor
16	A. Nobody really. My buddy Austin. That's about	16	that --
17	it.	17	A. That's -- I'm not sure really.
18	Q. Okay. Your friend Austin?	18	Q. -- you've seen the most? Is he the doctor
19	A. Yeah.	19	that you've seen --
20	Q. What's his name?	20	A. Maurer is the one that I've seen the most.
21	A. Austin Price.	21	M-A-U-E-R, I think. It's a lady. I'm not sure of her
22	Q. What's his phone number?	22	first name.
23	A. I'm not sure of it.	23	Q. Okay. Any others?
24	Q. Is it Price, P-R-I-C-E?	24	A. Gerald, Gregory Gerald.
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1	A. Yeah.	1	Q. Is Gerald different than Dr. Jarrell?
2	Q. You told me that you -- what did your doctor	2	A. They're all family medicine. Yeah, he's
3	tell you about being lifted up? You were talking to me	3	different than Jarrell.
4	about that a little bit.	4	Q. Dr. Gerald. Can you spell that?
5	A. What do you mean lifted up?	5	A. I don't really know how to spell it.
6	Q. Being lifted up by the officers and that's	6	Q. G-E-R-A-L-D maybe or..
7	what caused you to be paralyzed.	7	A. I guess.
8	A. He said it could have been a reason, that	8	Q. Or do you know?
9	there was such significant damage. It was a hundred	9	Now, have you talked to any South Charleston
10	percent tear in my spinal cord, I mean, and he said it	10	Police Officer about this at all?
11	was significant, meaning as it was like -- he told me it	11	A. No. I don't even go to South Charleston. I
12	was like pulling nerve endings, stretching them until	12	never will again.
13	they snap. You know how they fray on the ends?	13	Q. Have you talked to those two girls who videoed
14	Q. Yes.	14	it?
15	MR. diTRAPANO: I'm just going to lodge an	15	A. No.
16	objection to the -- to him saying "lifted up." I don't	16	Q. Have you talked to any of the EMS guys --
17	know that that's what he said. Maybe it was, but the	17	A. No.
18	record will reflect.	18	Q. -- or girls?
19	MR. RUGGIER: However you want to call it,	19	A. Not that I know of, I mean.
20	yeah, pulled up by them or whatever.	20	Q. Don't know?
21	BY MR. RUGGIER:	21	A. I guess they were out of Boone County, so I
22	Q. Did he say anything else to you --	22	don't go to Boone County no more, so I guess not.
23	A. Not really.	23	MR. diTRAPANO: I have to take a call at 3:00
24	Q. -- about how this happened?	24	remember.

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1	MR. RUGGIER: I do. I will hopefully be done.	1	Q. Yellow? Both of them are yellow?
2	BY MR. RUGGIER:	2	A. Red and yellow.
3	Q. Do you wish you would have just pulled over?	3	Q. Oh, red and yellow. I'm sorry.
4	MR. diTRAPANO: Object to the form.	4	A. And brazing hose, wire connectors, my book
5	A. I wish I would have had a chance to pull	5	bag. I don't know where that blue bag came from.
6	over.	6	Q. What is the -- what's a brazing hose for?
7	Q. Do you have any regrets about that day?	7	A. To braze two types of metals together, I mean,
8	MR. diTRAPANO: Object to the form.	8	like, brazing brass.
9	A. I don't know.	9	Q. What's that?
10	Q. What's that?	10	A. It's a type of welding.
11	A. I don't know.	11	Q. It's for welding. It's not ever used to make
12	Q. You said "I don't know"?	12	meth?
13	Do you regret driving on a motorcycle without	13	A. I'm not sure. I know that I use them for
14	a license?	14	welding, brazing.
15	A. Not really.	15	Q. Have you ever used it to make
16	Q. Do you regret driving the motorcycle that day	16	methamphetamines?
17	without insurance?	17	A. I've never made methamphetamines.
18	A. Yeah, I guess so.	18	Q. Have you ever used it to make any type of
19	Q. Do you regret not stopping the motorcycle --	19	illegal drugs?
20	MR. diTRAPANO: Object to the form.	20	A. No. I used them for what they are -- calls
21	-- when being pursued by the police?	21	for, brazing.
22	A. I don't know how to answer that.	22	There's a battery, which that's a headlight.
23	Q. What's that?	23	I mean a spotlight. And the headlight, wire
24	A. I said I don't really know how to answer that	24	connectors.
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1	because I don't feel as if I was being pursued. There	1	Q. What are the wire connectors for? The
2	was no lights on.	2	headlight?
3	MR. RUGGIER: I'd like to make this an	3	A. Connecting wires. I mean, yeah, the
4	exhibit. Make it Exhibit 1.	4	headlight.
5	MR. diTRAPANO: What is that?	5	Q. Okay.
6	MR. RUGGIER: Photos. Stuff that was -- I'll	6	MR. RUGGIER: It's 2:54.
7	show it to you in a second.	7	Q. What's the white cylindrical plastic thing
8	MR. diTRAPANO: Are these police officer	8	there in the middle?
9	photographs?	9	A. I have no clue at all.
10	MR. RUGGIER: Yes.	10	Q. Is that your book bag or is that a backpack or
11	(Means Deposition Exhibit No. 1 was marked for	11	do you know, the blue thing?
12	identification.)	12	A. I don't know where that came -- that backpack
13	MR. diTRAPANO: Okay. Do you want the witness	13	back up there in the corner, that was my backpack.
14	to look at it?	14	Q. The black one?
15	MR. RUGGIER: Yeah, take a look at it.	15	A. Yeah.
16	BY MR. RUGGIER:	16	Q. And you don't know what the blue thing is?
17	Q. Billy, handing you what's Exhibit 1. Do you	17	A. No.
18	see that?	18	Q. You have never seen that before?
19	A. Yeah.	19	A. No. That wouldn't fit in my backpack. I can
20	Q. Can you tell me what those items are?	20	fill a lot of stuff in that backpack.
21	A. Brazing torches, a battery.	21	Q. Okay. Before we make this an exhibit, do you
22	Q. One second. What color are the brazing	22	know what that is?
23	torches just so --	23	A. A speedometer or an rpm gauge, one of the
24	A. Red and yellow.	24	two.

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1 Q. Was that on your bike?		1 Q. That's your left. What's on your right?	
2 A. It was. It looks more like the rpm gauge.		2 A. It's Veritas and Aequitas.	
3 Does it go up to 16?		3 Q. Veritas and what?	
4 Q. I'm not sure. I can't see.		4 A. Aequitas.	
5 MR. RUGGIER: Make this Exhibit 2.		5 Q. What's that mean?	
6 (Means Deposition Exhibit No. 2 was marked for		6 A. Truth and justice.	
7 identification.)		7 Q. What's on your left?	
8 BY MR. RUGGIER:		8 A. An area code.	
9 Q. I'm handing you what's been marked as Exhibit		9 Q. What's that?	
10 2. Can you tell me what that is?		10 A. Area code.	
11 A. I have no clue. I don't know. I know that I		11 Q. Because you're from the 304?	
12 had nothing on me besides -- all that stuff right there		12 A. It was I was young and dumb, I mean.	
13 I can account for, but not that. It doesn't even look		13 Q. What's that?	
14 like my book bag actually.		14 A. I actually drew it and had nobody do it for	
15 Q. So is that your backpack?		15 me.	
16 A. It doesn't look like my backpack.		16 Q. When did you get both of those?	
17 Q. What's that?		17 A. I was 17.	
18 A. I said it doesn't look like my backpack.		18 Q. What's that?	
19 Q. So this is not your backpack in Exhibit 2?		19 A. When I was 17.	
20 A. It doesn't look like the one I had. It didn't		20 Q. Do you have any plans on going to school in	
21 have pockets like that.		21 the future?	
22 Q. And so do you know what is in the plastic		22 A. Not sure. Probably I will.	
23 inside the backpack there?		23 Q. What's that?	
24 MR. diTRAPANO: Object to the form. He said		24 A. I said I'm not sure. I may.	
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1 it's not his backpack.		1 MR. RUGGIER: 3:01. I'm done.	
2 Q. Or whatever this is in the photo in Exhibit 2.		2 MR. diTRAPANO: I have, like, maybe two	
3 Do you know what that is?		3 follow-up questions.	
4 A. Huh-uh.		4 EXAMINATION	
5 Q. You have to say it on the record.		5 BY MR. diTRAPANO:	
6 A. No, I don't know what it is.		6 Q. Billy, the first question is for	
7 Q. And so it's your testimony that this is not		7 clarification, was that when you testified earlier that	
8 your backpack in Exhibit 2.		8 through a series of questions about when you first could	
9 A. It doesn't look like my backpack. My backpack		9 tell that you had no feeling in your legs, that was	
10 was a military backpack.		10 somewhere in the process of the police dragging you	
11 Q. Okay.		11 across the railroad tracks.	
12 A. It was like a military -- it was a riding		12 A. Yes.	
13 backpack.		13 MR. RUGGIER: Objection to the form of the	
14 Q. At any point throughout that -- we'll call it		14 question, but you can answer.	
15 the pursuit, or however you want to phrase it, were you		15 A. Yeah.	
16 attempting to remove the backpack on your back and throw		16 Q. Okay. Did you answer yes in the	
17 it out?		17 affirmative?	
18 A. No.		18 A. Yes.	
19 MR. RUGGIER: I want to get copies of those		19 Q. And then for clarification on these exhibits,	
20 before we leave.		20 Exhibit 1 and 2, you were asked some questions about	
21 Q. What's your tattoo?		21 some -- it looked like bags or cylinders or something on	
22 A. Which one? This?		22 here.	
23 Q. Yeah. What's on your right arm?		23 You don't have any knowledge of what that is	
24 A. This?		24 and your testimony was that did not belong to you?	

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1	A. What, the cylinders?	1	of it. I'm not -- there's nothing really there. You
2	Q. No. Whatever the plastic bags were in Exhibit	2	know what I'm saying? It's...
3	2.	3	Q. I don't. Explain to me.
4	A. Yeah. That doesn't even -- I mean, it's	4	A. Like I don't know how to explain it. It
5	not -- it doesn't even look like -- it's not my book	5	wouldn't be something worth losing half my body not
6	bag, I mean.	6	pulling over. You know what I'm saying?
7	Q. You don't know what --	7	Q. Are you saying there's not enough drugs there
8	A. I have no clue as to what that is.	8	for you to actually even be worried about being pulled
9	Q. And I'm pointing to the bag --	9	over?
10	A. Yeah, the bag.	10	A. Yeah. But if it was not, I wouldn't worry.
11	Q. -- with the tied baggie, right?	11	You know what I'm saying? If it were me and I did have
12	A. Yeah.	12	that, I wouldn't be worried about getting caught with
13	Q. That's not yours?	13	it, I mean.
14	A. No.	14	Q. Why, because it's a small amount?
15	Q. And then whatever is in here, that's not	15	A. Because, yeah, I mean, it's -- there's nothing
16	yours.	16	really there, but it's not mine.
17	A. No.	17	Q. What is it? Do you know?
18	Q. So the first, just so we're clear, the first	18	A. I have no clue.
19	time that you knew that you could not move your legs was	19	Q. Just in looking at it, can you tell? What's
20	after the police officers had grabbed your wrists and	20	it look like to you?
21	drug you across the tracks.	21	A. It could be any -- I mean, what does it look
22	A. Yeah.	22	like to you? I mean, it could be powder, sugar in the
23	MR. diTRAPANO: That's all the questions I	23	bag.
24	have.	24	Q. Yeah, but, I mean, so it could look like
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1	MR. RUGGIER: I do not have any further	1	1 sugar, it could look like cocaine, it could look like
2	questions.	2	2 crystal meth. Is that --
3	Let me see that. Before we go, can you hand	3	A. I mean, it looks like some substance in a bag.
4	me that photo, Exhibit 1, the furthest one?	4	Q. I don't know. My knowledge is from Breaking
5	EXAMINATION	5	Bad, man, so I don't know.
6	BY MR. RUGGIER:	6	MR. diTRAPANO: Object to the form.
7	Q. Up at the top in Exhibit 1, it looks like a	7	A. Breaking Bad.
8	black backpack. Is that yours?	8	MR. diTRAPANO: I don't think I have any
9	A. Yeah.	9	further questions.
10	Q. Okay. And the black backpack in Exhibit 2,	10	Do you have anything else?
11	does that not look like the same backpack that's in	11	MR. RUGGIER: No.
12	Exhibit 1?	12	(Having not requesting to read his deposition
13	A. Not to me. I mean, because I know my backpack	13	before filing, further this deponent saith not.)
14	didn't have these. I mean, it didn't have those kind of	14	
15	pockets.	15	
16	Q. You're saying yours didn't have the drugs or	16	
17	whatever --	17	
18	A. It didn't have those type of pockets.	18	
19	Q. Okay.	19	
20	A. And I had no drugs at all, I mean. I mean...	20	
21	Q. What's that?	21	
22	A. I mean.	22	
23	Q. You just don't know where that came from?	23	
24	A. I don't know. And even if -- it can't be much	24	

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1 STATE OF WEST VIRGINIA,
2
3 COUNTY OF PUTNAM, to-wit:

4 I, Laurie L. Cunningham, a Notary Public within and
5 for the County and State aforesaid, duly commissioned
6 and qualified, do hereby certify that the foregoing
7 deposition of WILLIAM MEANS, was duly taken by me and
8 before me at the time and place and for the purpose
9 specified in the caption hereof, the said witness having
10 been by me first duly sworn.

11 I do further certify that the said deposition was
12 correctly taken by me in shorthand notes, and that the
13 same were accurately written out in full and reduced to
14 typewriting and that the witness did not request to read
15 his transcript.

16 I further certify that I am neither attorney or
17 counsel for, nor related to or employed by, any of the
18 parties to the action in which this deposition is taken,
19 and further that I am not a relative or employee of any
20 attorney or counsel employed by the parties or
21 financially interested in the action and that the
22 attached transcript meets the requirements set forth
23 within Article twenty-seven, Chapter forty-seven of the
24 West Virginia code.

My commission expires April 25, 2025.

Given under my hand this 26th day of April, 2021.

Laurie L. Cunningham

22 Laurie L. Cunningham, RPR
Notary Public



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Exhibits	410-3619 11:20	alleged 32:5,7 Allen 11:10 ambulance 31:24 33:22,23 amount 45:15 95:14 amphetamines 35:5 36:15 angle 17:22 ankle 59:1 anticipate 16:9 anymore 64:23 66:3 67:18 apologize 42:19 appetite 71:2 approved 7:9,11,12 area 8:15 16:18 91:8, 10 arm 31:2 90:23 arms 26:7,10 arrest 5:9,12 10:2 asks 34:6 asleep 49:3,4,7 71:17 attempting 41:21,22 90:16 attorney 44:12 audible 16:11 audibly 29:24 audio 21:12 aunt 61:16,17,19,21 70:19,20 77:4,6,17,20 81:11,12 aunt's 69:11 Austin 81:16,18,21 Avenue 56:14 avoids 59:3	bike's 17:8 bilateral 58:23 Billy 4:7 16:5 86:17 92:6 birth 15:16 18:15 bit 70:16 72:11 82:4 black 8:6 88:14 94:8, 10 Blizzard 38:5,6,8,11, 21 40:9 42:2 Blizzard's 37:11,12, 13 38:9 40:6,14,20, 22,23 41:2,12,15,20 42:1,7 blocked 76:14 blue 87:5 88:11,16 Bluetooth 5:22,24 6:10 bluntly 32:24 board 50:11 body 71:6,9 77:23 78:16 95:5 boil 73:18 book 87:4 88:10 89:14 93:5 Boone 84:21,22 bothered 58:5 bottom 58:24 bounced 18:3 bowel 48:18,19 50:12,18,21 61:12 Bradley 56:2 brass 87:8 braze 87:7 brazing 86:21,22 87:4,6,8,14,21 break 51:17 66:6,8,9 Breaking 96:4,7 breathe 27:11 30:10 31:21 breed 57:21 bricks 67:18
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